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NOTE This  
Safety requirement



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 23 1982

Implement during  
CA tasks

MEMORANDUM

SUBJECT: Evaluation of Occupational Health and Safety Programs  
for EPA Employees at Superfund Sites

FROM: John P. Horton, Assistant Administrator  
for Administration (PM-208)

William N. Hedeman, Jr., Director  
Office of Emergency and Remedial Response (WH-548)

TO: On-Scene-Coordinators  
Superfund Coordinators

931625  
US EPA RECORDS CENTER REGION 5



506795

The EPA's Occupational Health and Safety Staff (OHSS) will be evaluating the occupational health and safety (OHS) programs covering our employees at Superfund sites. These evaluations will provide us with the information we need to assure that our OHS programs are working in the field.

The National Institute for Occupational Safety and Health (NIOSH) will support us by conducting the site OHS evaluations for OHSS. You will find a description of the details of this project in the EPA/NIOSH Interagency Agreement attached to this memorandum.

Many of you will be contacted by your Regional Occupational Health and Safety Designee, who is coordinating this project for OHSS in your Region, and by NIOSH's Regional Industrial Hygienist. You will be asked to help select the sites (candidates attached) for evaluation and provide the local support that NIOSH will need. We have assured NIOSH of your full cooperation.

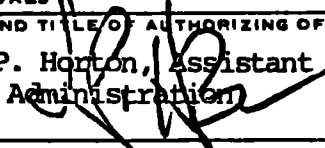
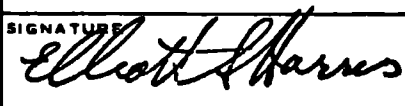
David Weitzman, OHSS, is the EPA Project Officer. Contact him at FTS 382-3647 if you have any questions about, or suggestions for, this project. If you are no longer On-Scene or Superfund Coordinator, please transfer this memorandum to your replacement.

Attachment (2)

cc with Attachments

J. Bahnick  
K. Biglane  
K. Dawsey

R. Magor  
W. Ruch (NIOSH)  
H. VanCleave  
R. Wyer

<b>10. EPA PROJECT OFFICER</b> David Weitzman	<b>TELEPHONE</b> 382-3647	<b>11. OTHER AGENCY PROJECT OFFICER</b> Walt Ruch	<b>TELEPHONE</b> FTS 399-0502
<b>ADDRESS</b> U.S. Environmental Protection Agency Occupational Health and Safety Staff 401 M Street, S.W. (PM-273) Room 3503M Washington, D.C. 20460		<b>ADDRESS</b> NIOSH/CDC Arcade Plaza Building 1321 Second Avenue MS-837 Seattle, Washington 98101	
<b>12. EQUIPMENT-PROCUREMENT OF EQUIPMENT WITH EPA FUNDS IS:</b> <input type="checkbox"/> NOT AUTHORIZED <input checked="" type="checkbox"/> AUTHORIZED <input type="checkbox"/> SUBJECT TO THE FOLLOWING LIMITATIONS:  Equipment purchased will be inventoried in accordance with the supplying agency regulations. The supplying agency will be the accountable agency for all items of equipment costing \$25,000 or less. EPA will be the accountable agency for all items of equipment costing over \$25,000 or which form part of an integrated equipment system costing over \$25,000. An inventory of equipment purchased will be submitted by the supplying agency annually to EPA on the anniversary of this agreement. A final inventory of such equipment will be submitted to EPA within 30 days of completion of the work and services under this agreement. Title to equipment purchased shall be vested in EPA whose decision concerning the disposition of the equipment shall be final. The agencies shall mutually determine the procedure for inventorying, accounting, and disposing of jointly funded equipment.			
<b>13. EQUIPMENT TO BE FURNISHED OR ACQUIRED</b>			
<b>14. ESTIMATED COST</b>			
a. TOTAL ESTIMATED PROJECT COST	\$	b. AMOUNT TO BE FUNDED BY THIS AGREEMENT/AMENDMENT	\$
EPA SHARE	\$ 282,000	EPA SHARE	\$
OTHER AGENCY SHARE	\$	OTHER AGENCY SHARE	\$
<b>15. METHOD OF PAYMENT</b> <input type="checkbox"/> ADVANCE* <input checked="" type="checkbox"/> REIMBURSEMENT <input type="checkbox"/> ALLOCATION TRANSFER *Unexpended amounts remaining at completion of the work will be returned to EPA.			
<b>16. BILLING INSTRUCTIONS:</b> Request for payment will be made by Itemized SF-1081 submitted to:  U.S. Environmental Protection Agency Financial Management Division Room 214 26 West St. Clair Street Cincinnati, Ohio 45268  and will cite the following accounting information:			
APPROPRIATION	ACCOUNT NO.	DCN NO.	OBJECT CLASS
68-20X8145	2TEQ51H0SF	SF2004	25.49
			NIOSH-IA-82-40 AD75F2A099
REQUEST FOR REIMBURSEMENT OF ACTUAL COSTS WILL BE ITEMIZED AND SUBMITTED: <input type="checkbox"/> MONTHLY <input type="checkbox"/> QUARTERLY <input type="checkbox"/> UPON COMPLETION OF WORK			
<b>17. AUTHORITY</b> Comprehensive Environmental Response, Compensation, and Liability Act of 1980. (P.L. 96-501), Section III			
<b>18. APPROVALS</b>			
a. NAME AND TITLE OF AUTHORIZING OFFICIAL FOR EPA	SIGNATURE	DATE	
John P. Horton, Assistant Administrator for Administration		MAR 2 1982	
b. NAME AND TITLE OF AUTHORIZING OFFICIAL FOR OTHER AGENCY	SIGNATURE	DATE	
J. Donald Millar, M.D. Assistant Surgeon General, Director, NIOSH		MAR 8 1982	

<b>U.S. ENVIRONMENTAL PROTECTION AGENCY INTERAGENCY AGREEMENT</b> (Please read instructions on page 3)		<b>1. EFFECTIVE DATE</b>	<b>2. COMPLETION DATE</b>	<b>3. AGREEMENT NO.</b>
<b>4. NAME AND ADDRESS OF EPA ORGANIZATION</b> U.S. Environmental Protection Agency Occupational Health and Safety Staff (PM273) 401 M Street, S.W. Washington, D.C. 20460		<b>5. NAME AND ADDRESS OF OTHER ORGANIZATION</b> National Institute for Occupational Safety and Health Parklawn Building Room 841 Fischers Lane, Rockville, Md. 20857		
<b>6. PROJECT TITLE</b> Evaluations of Occupational Health and Safety Programs at EPA Superfund Sites				
<b>7. SCOPE OF WORK</b>  See Attachment I Scope of Work pages 1 and 2				
<b>8. SPECIAL PROVISIONS</b> This agreement may be terminated by either Agency upon <u>30</u> days advance written notice.  This agreement may be amended by mutual agreement of both parties.				
<b>9. REPORTS</b>  See Attachment I, Reports of Work, pages 2 and 3				



# EPA-NIOSH INTERAGENCY AGREEMENT

N'IOSH-IA-82-40

## ATTACHMENT I

### STATEMENT OF WORK

#### Background

The Environmental Protection Agency (EPA), in response to Executive Order 12195 and 29 CFR 1960, is committed to assuring safe and healthful working conditions for its employees. EPA's line managers are directly responsible for the occupational health and safety of their employees. EPA Headquarters Occupational Health and Safety Staff (OHSS) supports these managers and evaluates their OHS programs. Due to staff limitations, the OHSS is entering into this Interagency Agreement (IAG) to have NIOSH evaluate the occupational health and safety programs for EPA employees at Superfund sites.

Adequately trained Industrial Hygiene and Safety professionals shall conduct the evaluations. Professionals with expertise in other aspects of occupational health and safety may be required for some evaluations. The evaluations will require professionals having expertise in occupational health and safety problems resulting from hazardous materials releases.

NIOSH evaluators must complete EPA's Hazardous Materials Incident Response Operations Course 163.5 prior to conducting an evaluation.

#### Scope of Work

1. NIOSH shall perform thirty (30) evaluations within a 1-year period to support occupational health and safety programs at EPA Superfund sites or at other sites where EPA employees are working for Superfund programs. OHSS will designate candidate sites for these thirty (30) evaluations within four (4) weeks after the effective date of this IAG. Tentative candidate sites are shown in Table 1. The sites will be well distributed geographically when possible. OHSS will authorize the evaluations and provide existing site specific safety plans as well as all available information regarding the nature and contents of the site, e.g., site safety plan, site history, photographs and, in summarized form, the results of any environmental analyses, etc., seven (7) weeks before evaluation and/or monitoring begins. Within four (4) weeks after the effective date of the IAG, NIOSH and OHSS will develop a mutually acceptable schedule to sample the five (5) sites and evaluate the other twenty-five (25) sites. With both agencies agreeing, the sites selected and schedule can be modified.

2. NIOSH shall evaluate the OHS program at the 30 sites according to the OHSS criteria in Appendix A or alternative criteria proposed by NIOSH. The NIOSH consultation shall be concerned



solely with occupational health and safety to support hazardous materials response operations. The coordinator has complete discretion concerning the use of reports provided by NIOSH as a result of this consultation. NIOSH shall conduct opening and closing briefings for the Coordinator covering all important aspects of the evaluations. NIOSH shall provide approximately two (2) qualified professionals spending approximately three (3) days on location to conduct the evaluation.

3. NIOSH shall conduct personnel monitoring at five (5) of the 30 sites designated by OHSS with concurrence by NIOSH. NIOSH will submit a complete monitoring study plan for each site for OHSS approval three (3) weeks before monitoring begins. OHSS shall coordinate all site visits and, to the extent possible, assure that the requisite needs of NIOSH personnel performing the site evaluations are met prior to arrival on site. This should include:

- ° Identification of contact person(s) and his/her phone number;
- ° Assuring that a suitable workplace on site is available;
- ° Assuring access to appropriate personnel for air monitoring, personal dosimetry, private interviews and medical record reviews; and
- ° Furnish any specialized equipment or exotic protective equipment that may be needed.

4. NIOSH shall use professionally accepted methodologies for selection and use of direct reading instruments and sampling and analysis to attempt to determine the potential for exposure of employees to toxic materials. NIOSH shall have samples analyzed by AIHA accredited laboratories. Appropriate biological monitoring may be utilized if deemed appropriate by NIOSH and acceptable to OHSS and the subject employees within available resources. NIOSH will provide the raw data collected, except personal information protected by the Privacy Act, and the monitoring procedures used upon request by OHSS.

#### Period of Performance

The period of performance of this IAG shall be twelve (12) months after the effective date of the IAG exclusive of all reports required under ARTICLE III.

#### Reports of Work

The following reports shall be prepared and forwarded to OHSS by NIOSH in accordance with each specified requirement. Reports submitted under this IAG shall reference and cite the IAG in addition to identifying the Environmental Protection Agency as the sponsoring agency.

##### A. Plan of Performance

(For NIOSH's first two evaluations) Within thirty (30) days after notification of the authorization for an evaluation, NIOSH shall

submit to OHSS, for review and comment, two (2) copies of a detailed plan for completion of the evaluation including background and purpose of the evaluation. The plan shall include the methods which NIOSH expects to use (including OHSS evaluation criteria checklist), the names of the assigned professionals, any change of personnel, projected manpower and the format which will be used for reporting the results and recommendations.

B. Monthly Periodic Progress Report

NIOSH shall furnish three (3) copies of a Periodic Progress Report, briefly stating the progress made, including percent completion of the project as of the end of the reporting period. Specific areas of interest shall include difficulties encountered during the reporting period and remedial action taken and a statement of activity anticipated during the subsequent reporting period. The report shall also include any change of personnel concerned with the project.

Period Reports shall be submitted to OHSS on or before the tenth (10) of each month following the first complete month of the IAG performance.

C. Draft Final Evaluation Report

NIOSH shall submit to OHSS a Draft Final Evaluation Report for each location evaluation/consultation in six (6) copies within one (1) month after the completion of the evaluation. OHSS will review and return each submission of the Draft Final Report providing comments, if necessary, within thirty (30) calendar days. In the event OHSS delays review and return of any submission of the Draft Final Report beyond the period specified, NIOSH will be entitled to a day-for-day extension in submission of any subsequent Draft Final and Final Report(s). The draft copy shall be typed double spaced or space-and-a-half and shall include all illustrations, tables, drawings, charts, data sheets, and other pertinent material required by the Final Report.

D. Final Evaluation Report

Within fifteen (15) days after review of the Draft by OHSS, NIOSH shall submit six (6) copies of the Final Evaluation Report to OHSS.

TABLE I

EPA SUPERFUND SITES TO BE EVALUATED

Region I	Keefe Environmental Services, Epping, NH Ottati and Goss, Kingston, NH Sylvester Site, Nashua, NH Mark Phillip Trust, Woburn, MA
Region II	Burnt Fly Bog, Marlboro, NJ Kin-Buc, Edison, NJ LiPari Landfill, Pitman, NJ Bridgeport Rental and Oil Services, Bridgeport, NJ Price Landfill, Pleasantville, NJ Pollution Abatement Services, Oswego, NY Love Canal, Niagara Falls, NY
Region III	Lehigh Electric and Engineering Co., Old Forge, PA ABM Wade Site, West Chester, PA Bruin Lagoon, Bruin, PA Brodhead Creek, Stroudsburg, PA
Region IV	Luminous Processors, Inc., Athens, GA Valley of the Drums, Brooks, KY South Carolina Recycling and Disposal, Columbia, SC
Region V	Midco I, Gary, IN Seymour Recycling, Seymour, IN Outboard Marine Corporation, Waukegan, IL Chem-Dyne Corporation, Hamilton, OH Old Mill Site, Rock Creek, OH Reilly Tar and Chemical Corporation, St. Louis Park, MN Gratiot County Landfill, St. Louis, MI
Region VI	French Limited, Crosby, TX Motco, LeMarque, TX
Region VII	Callahan Property, Ellisville, MO Aidex Corporation, Council Bluffs, IA
Region IX	Stringfellow Acid Pits, Riverside County, CA

## APPENDIX A

Date of Evaluation \_\_\_\_\_  
 Evaluator \_\_\_\_\_

Site \_\_\_\_\_

Revised RfK 2/2/82  
 DISC #3 DOC #32

## SUPERFUND SITE OCCUPATIONAL HEALTH AND SAFETY PROGRAM EVALUATION

PROGRAM ELEMENT	SUPERFUND SITE PROGRAM MUST COMPLY WITH THESE CRITERIA	SCORE	DEFICIENCY AND REMEDY
<b>1. POLICY AND RESPONSIBILITY</b>			
<b>SCORING SYSTEM</b> % 0 - Nonexistent 25 - Major Deficiencies 50 - Fair 75 - Minor Deficiencies 100 - Excellent	(a) A policy statement is issued and its provisions are adequate.		
	(b) Responsibilities are assigned and documented.		
	(c) Responsibilities address the following concerns:		
	(°) Qualifications of safety officials.		
	(°) Allocation of resources.		
	(°) Inspections and audits.		
	(°) Safety manuals, plans, and emergency procedures.		
	(°) Reporting and recordkeeping.		
	(°) Medical monitoring		
	(°) Selection of work practices.		
	(°) Selection of levels of personnel protection		
	(°) Certified Training		
	(°) Employee participation and compliance with program		
	total		
Weighted Score (20 points max) x ( avg % ) =			÷ ( ) = ( avg%)

## References:

Draft EPA OHS Manual Chapter 9 - Hazardous Waste Site Investigations and Environmental Spill Responses  
 EPA Hazardous Response Division - Interim SOP



Date of Evaluation \_\_\_\_\_  
 Evaluator \_\_\_\_\_

Site \_\_\_\_\_

Revised RFK 2/2/82  
 DISC #3 DOC #32

SUPERFUND SITE OCCUPATIONAL HEALTH AND SAFETY PROGRAM EVALUATION

PROGRAM ELEMENT	SUPERFUND SITE PROGRAM MUST COMPLY WITH THESE CRITERIA	SCORE	DEFICIENCY AND REMEDY
2. HEALTH AND SAFETY PROGRAM REQUIREMENTS			
	(a) Site Safety Plan is prepared, reviewed, and readily available.		
	(b) Sites are routinely inspected and program is reviewed semi-annually by local OHS official.		
	(c) Illness and accident reports are completed and forwarded.		
	(d) Employees meet minimum training requirements.		
	(e) Emergency procedures are adequate, prepared, and available.		
	(f) Employees participate in medical surveillance program.		
	total		÷ ( ) = ( avg%)
Weighted Score (30 points max) x ( avg %) =			

## APPENDIX A

Date of Evaluation \_\_\_\_\_  
 Evaluator \_\_\_\_\_

Site \_\_\_\_\_

Revised RFK 2/2/82  
 DISC #3 DOC #32

## SUPERFUND SITE OCCUPATIONAL HEALTH AND SAFETY PROGRAM EVALUATION

PROGRAM ELEMENT	SUPERFUND SITE PROGRAM MUST COMPLY WITH THESE CRITERIA	SCORE	DEFICIENCY AND REMEDY
3. WORK PRACTICES	(a) Adequate protective clothing is worn by all personnel.		
	(b) Appropriate work-rest regimen and replacement of fluids salt deal with heat stress.		
	(c) Eye protection is worn on-site and meets ANSI Z87.1		
	(d) No eating, drinking, etc, on-site.		
	(e) Hazardous substances are immediately washed off contaminated personnel.		
	total		
Weighted Score (20 points max) x ( avg %) =			÷ ( )=( avg%)

Date of Evaluation \_\_\_\_\_  
 Evaluator \_\_\_\_\_

Site \_\_\_\_\_

Revised RFK 2/2/82  
 DISC #3 DOC #32

SUPERFUND SITE OCCUPATIONAL HEALTH AND SAFETY PROGRAM EVALUATION

PROGRAM ELEMENT	SUPERFUND SITE PROGRAM MUST COMPLY WITH THESE CRITERIA	SCORE	DEFICIENCY AND REMEDY
4. OPERATIONAL PRACTICES	(a) Reconnaissance data is used to prepare site safety plan.		
	(b) Appropriate levels of protection are established and equipment provided.		
	(c) Zones are established, delineated, and posted.		
	(d) Radioactivity and explosivity levels are checked on first entry.		
	(e) Buddy system required for any work in contamination zones.		
	(f) Exposure during sampling, packaging, and shipping is minimized.		
	(g) Concentrated waste or runoff is handled as highly toxic substance.		
	(h) A respirator program is provided which meets OSHA requirements.		
	(i) EPA procedures for selection of respirator type are followed.		
	(j) Effectiveness of heat stress program is monitored.		



## APPENDIX A

Date of Evaluation \_\_\_\_\_  
 Evaluator \_\_\_\_\_

Site \_\_\_\_\_

Revised RFK 2/2/82  
 DISC #3 DOC #32

## SUPERFUND SITE OCCUPATIONAL HEALTH AND SAFETY PROGRAM EVALUATION

PROGRAM ELEMENT	SUPERFUND SITE PROGRAM MUST COMPLY WITH THESE CRITERIA	SCORE	DEFICIENCY AND REMEDY
	(k) Sampling equipment is disposable or kept clean.		
	(l) All equipment leaving site is decontaminated and verified where possible.		
	(m) Hazardous materials are shipped in accordance with DOT regulations.		
	(n) Procedures for leaving site are planned before entry.		
	(o) Appropriate direct reading equipment is used to monitor on-site hazards.		
	(p) Appropriate decontamination equipment is available on-site.		
	total		÷ ( ) = ( avg%)
Weighted Score (30 points max) x ( avg %) =			

CANDIDATE HAZARDOUS WASTE SITES

Region I      Keefe Environmental Services, Epping, NH  
Ottati and Goss, Kingston, NH  
Sylvester site, Nashua, NH  
Mark Phillip Trust, Woburn, MA

Region II     Burnt Fly Bog, Marlboro, NJ  
Kin-Buc, Edison, NJ  
LiPari Landfill, Pitman, NJ  
Bridgeport Rental and Oil Services, Bridgeport, NJ  
Price Landfill, Pleasantville, NJ  
Pollution Abatement Services, Oswego, NY  
Love Canal, Niagara Falls, NY

Region III    Lehigh Electric and Engineering Co., Old Forge, PA  
ABM Wade Site, West Chester, PA  
Bruin Lagoon, Bruin, PA  
Brodhead Creek, Stroudsburg, PA  
Drake Chemical Corporation, Lock Haven PA

Region IV    Luminous Processors, Inc., Athens, GA  
Valley of the Drums, Books, KY  
South Carolina Recycling and Disposal, Columbia, SC

Region V     Midco I, Gary, IN  
Seymour Recycling, Seymour, IN  
Outboard Marine Corporation, Waukegan, IL  
Chem-Dyne Corporation, Hamilton, OH  
Old Mill Site, Rock Creek, OH  
Reilly Tar and Chemical Corporation  
St. Louis Park, MN  
Gratiot County Landfill, St. Louis, MI

Region VI    French Limited, Crosby, TX  
Motco, LeMarque, TX  
Crystal Chemical, Houston, TX

Region VII   Callahan Property, Ellisville, MO  
Aidex Corporation, Council Bluffs, IA

Region IX    Stringfellow Acid Pits, Riverside County, CA

SUPERFUND REGIONAL COORDINATORS

Office

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Superfund Regional Manager  
Office of Regional Administrator  
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Environmental Impact Branch  
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Bill Contstantelos, Deputy Director  
Air & Hazardous Materials Division  
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U.S. EPA - Region VI  
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Non-Responsive



SUPERFUND REGIONAL COORDINATORS (Cont'd)

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C. Alvin Yorke, Chief  
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Surveillance & Analysis Division  
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Non-Responsive

EPA ON-SCENE COORDINATORS BY REGION

REGION I

Robert Ankstitus  
Don Berger  
Jack Conlon  
Carl Eidam  
Paul Groulx  
David McIntyre  
Steven Novick  
David Tordoff

REGION II

Bob Cobiella  
Paul Elliot  
Kevin Lynch  
Mike Polito  
Fred Rubel  
Gad Tawadros  
John Witkowski  
George Zachos

REGION III

Jack Downie  
John Harsch  
Thomas Massey  
Bruce Potoka  
Phil Retallick  
Jerry Saseen  
Ben Wilmoth  
Mike Zickler

REGION IV

Allen Bartlett  
Warren Dixon  
Ed Hatcher  
Chuck McPherson  
George Moein  
Jan Rogers  
Al Smith  
Jack Stonebreaker  
Fred Stroud  
Ray Wilkerson

REGION V

Joel Balmat  
Sylvester Bernotes  
Paul Bitter  
Robert Bowden  
Jack Brown  
Donald Bruce  
Charles Castle  
Russ Diefenbach  
Joe Fredle  
Gregg Kulma  
Beverly Kush  
George Madany  
Chet Marcyn  
Norman Niedergang  
Tim O'Mara  
Steve Ostrodka  
Mike O'Toole  
James Pankamin  
Dan Papcke  
Ross Powers  
Tony Rudder  
Karen Waldwogel

REGION VI

Wally Cooper  
Bob Forest  
Charles Gazola  
David Lopez  
Dick Peckham

REGION VII

Paul Doherty  
Dan Harris  
Phil Keary  
Bill Keffer  
Bill Longston  
Gary Snodgrass

REGION VIII

Richard M. Jones  
Pete Larson  
Floyd Nichols  
Alvin Yorke

REGION IX

Ronald Clawson  
Joseph Ferreri  
William Lewis  
David Minard  
Robert Mullianux  
Chris Vais

Region X

Carl Kitz  
Warren Montgomery  
James Willman